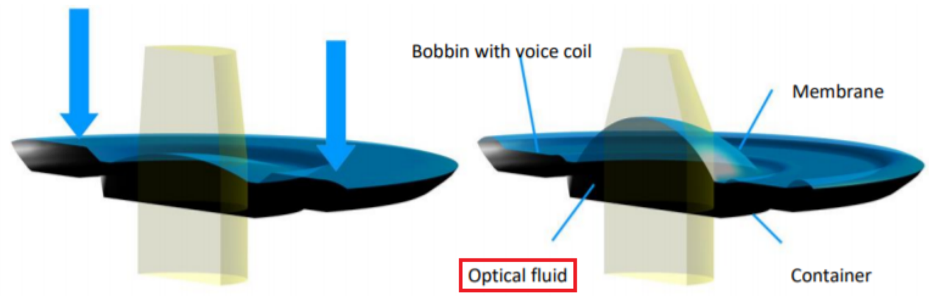
EXHIBIT 16

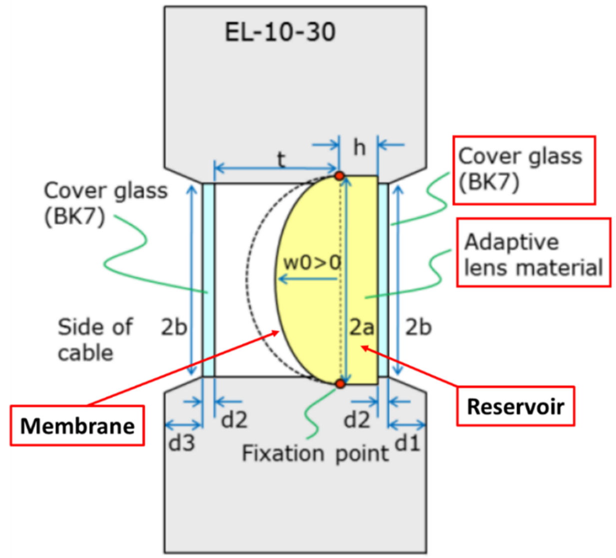
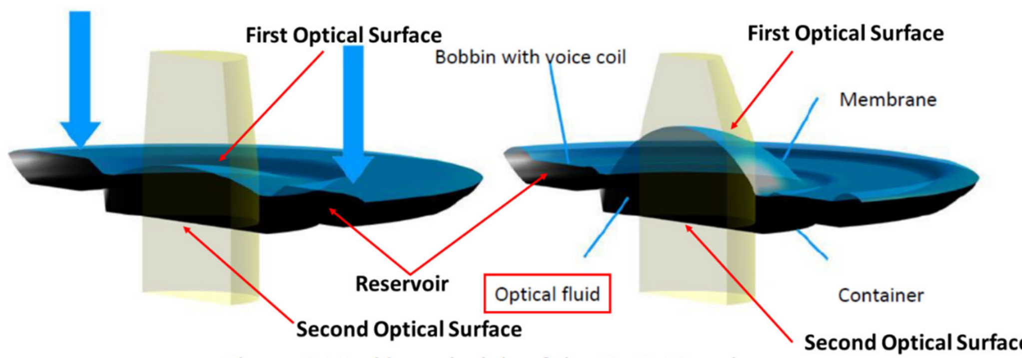
Exhibit No. 16

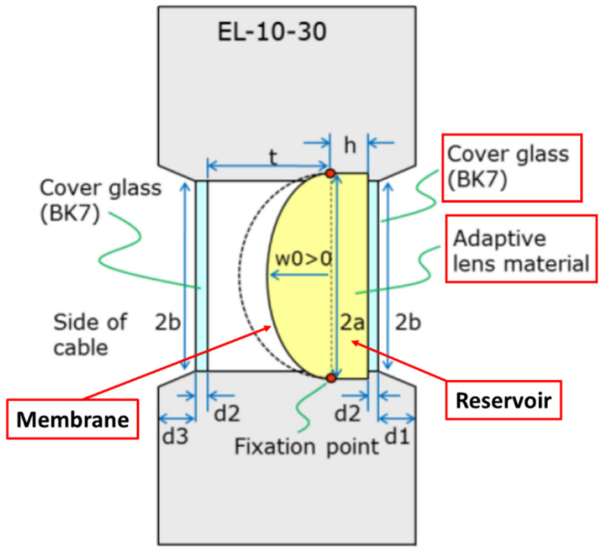
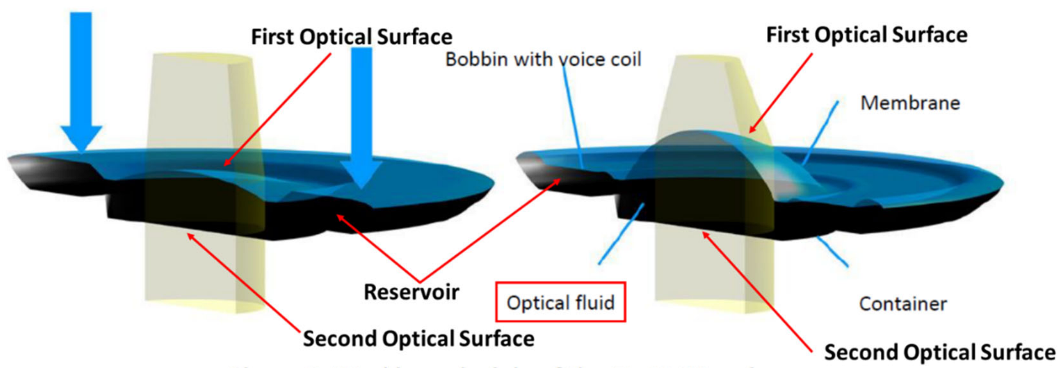
Infringement Claim Chart of U.S. Patent No. 8,665,527 by Optotune and Edmund Optics[1]

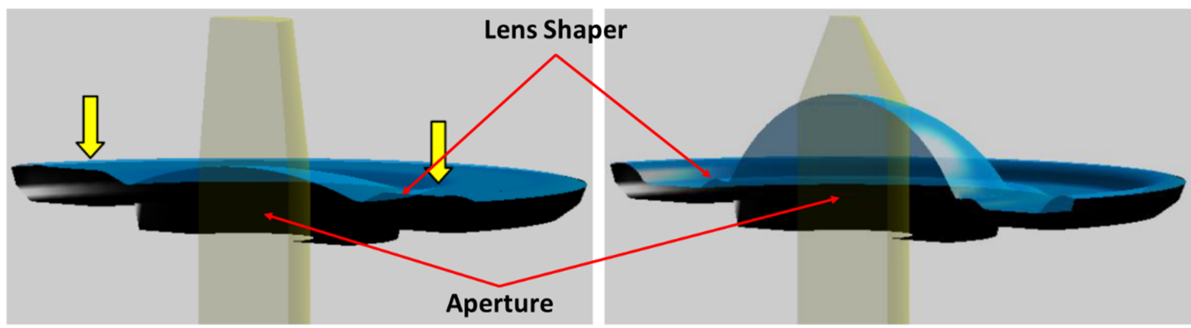
Accused products including Optotune's liquid focus tunable lenses based on electrical actuation (including EL-3-10, EL-10-30-TC, EL-10-30-C, EL-10-42-OF, EL-16-40-TC, and ELM lens) and Edmund Optics' liquid lens products that integrate Optotune's electrically actuated liquid focus tunable lenses (including MercuryTL™ Liquid Lens Telecentric Lenses, Optotune Focus Tunable Lens, Tunable Compact Objective Liquid Lens Assemblies, LT Series Fixed Focal Length Lenses, and Dynamic Focus VZM™ Lens) (the "Accused Products") infringe each element of the Asserted Claims of U.S. Patent No. 8,665,527 (the "'527 Patent"). Further, Optotune and Edmund Optics instruct their customers regarding the use of the Accused Products to enable the use of the features identified throughout this chart. Optotune and Edmund Optics intend and instruct that their customers use these features in a manner that practices each element of the Asserted Claims. Plaintiff contends each of the following limitations is met literally, and, to the extent a limitation is not met literally, it is met under the doctrine of equivalents.

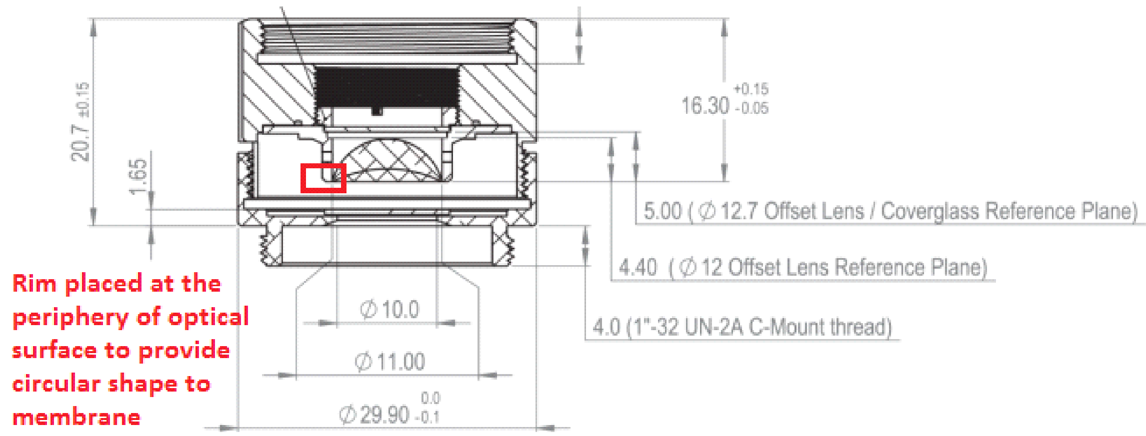
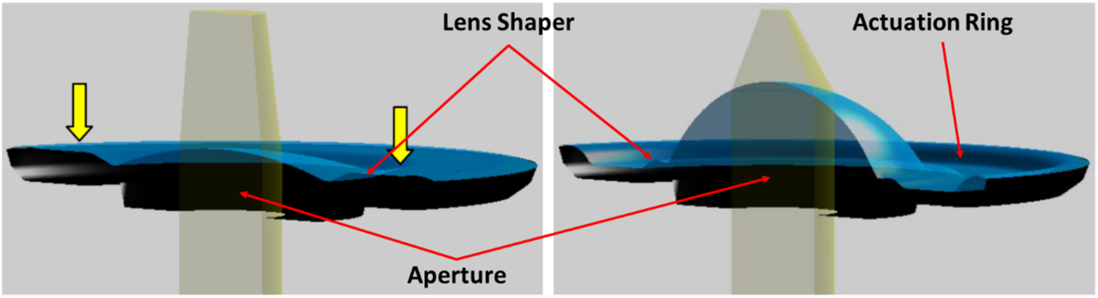
[1] This claim chart is based on the information currently available to Plaintiff and is intended to be exemplary in nature. Plaintiff reserves all rights to update and elaborate their infringement positions, including as Plaintiff obtains additional information during the course of discovery.

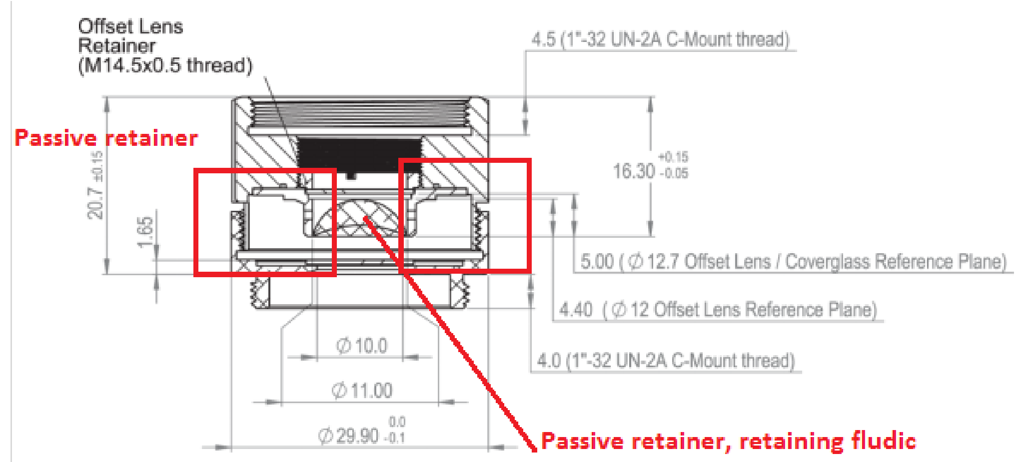
Claim	Accused Product
[1Pre] A fluidic lens, comprising:	The Accused Products meet this limitation. The Optotune EL-10-30-C includes a fluidic lens (i.e. electrically tunable lens EL-10-30-C with optical fluid). More specifically, the Optotune EL-10-30-C lens is a shape-changing lens based on a combination of optical fluids and a polymer membrane. **Working principle** The EL-10-30 is a shape-changing lens, as illustrated in Figure 5. It consists of a container, which is filled with an optical fluid and sealed off with an elastic polymer membrane. The deflection of the lens is proportional to the pressure in the fluid. The EL-10-30 has an electromagnetic actuator that is used to exert pressure on the container. Hence, the focal distance of the lens is controlled by the current flowing through the coil of the actuator.  *Figure 5: Working principle of the EL-10-30 series.* Optotune EL-10-30-Series Spec Sheet at 6.
[1A] a reservoir at least partially bounded by a first optical surface and a second optical surface;	The Accused Products meet this limitation. The Optotune EL-10-30-C includes a reservoir at least partially bounded by a first optical surface (i.e., membrane) and a second optical surface (i.e., cover glass).

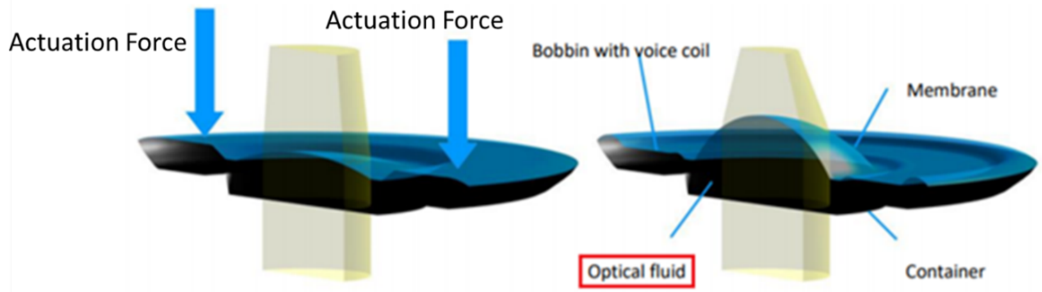
	 Optotune EL-10-30-Series Spec Sheet at 5.  *Figure 5: Working principle of the EL-10-30 series.* Optotune EL-10-30-Series Spec Sheet at 6.
[1B] a fluid; wherein the fluid fills a volume of the reservoir;	The Accused Products meet this limitation.

	The Optotune EL-10-30-C includes a fluid (also referred to as adaptive lens material) that fills a volume of the reservoir.  Optotune EL-10-30-Series Spec Sheet at 5.  *Figure 5: Working principle of the EL-10-30 series.* Optotune EL-10-30-Series Spec Sheet at 6.

	Working principle The EL-10-30 is a shape-changing lens, as illustrated in Figure 5. It consists of a container, which is filled with an optical fluid and sealed off with an elastic polymer membrane. The deflection of the lens is proportional to the pressure in the fluid. The EL-10-30 has an electromagnetic actuator that is used to exert pressure on the container. Hence, the focal distance of the lens is controlled by the current flowing through the coil of the actuator. Optotune EL-10-30-Series Spec Sheet at 6.
[1C] a rim configured to contact a portion of the first or second optical surface from outside the reservoir; and	The Accused Products meet this limitation. The Optotune EL-10-30-C includes a lens shaper (i.e., rim) configured to contact the membrane (i.e., first optical surface) from outside the reservoir (i.e., the lens shaper remains in place relative to the container or reservoir).  Figure 3: Working principle of the Optotune's EL-10-30. In this case, the lens-shaper ring remains in place relative to the container. The only movement is a ring that pushes down on the membrane with increasing current in the outer part of the lens, thus pumping the liquid into the lens that forms in the center. Optotune Focus Tunable Lenses and Laser Speckle Reduction at 3.

	 Optotune EL-10-30-Series Spec Sheet at 3. The Optotune EL-10-30-C also includes an actuation ring that is in contact with the membrane (i.e., first optical surface) and configured to push down the membrane during actuation.  Figure 3: Working principle of the Optotune's EL-10-30. In this case, the lens-shaper ring remains in place relative to the container. The only movement is a ring that pushes down on the membrane with increasing current in the outer part of the lens, thus pumping the liquid into the lens that forms in the center. Optotune Focus Tunable Lenses and Laser Speckle Reduction at 3.

[1D] a passive retainer configured to retain one or more of the reservoir or fluidic lens,	The Accused Products meet this limitation. The Optotune EL-10-30-C includes a passive retainer to retain the reservoir and the fluidic lens.  *Figure 2: Mechanical drawing of the EL-10-30-C (unit: mm). The upper right panel shows the position of the M4 threaded hole for mounting of the EL-10-30-C* Optotune EL-10-30-Series Spec Sheet at 3.
[1E] wherein one or more of the first optical surface or second optical surface is configured to deform as a result of a change in a pressure applied to the fluid or a change in contact between the rim and the first or second optical surface.	The Accused Products meet this limitation. The Optotune EL-10-30-C includes an electromagnetic actuator to apply a pressure to the fluid by pressing the outer portion of the membrane (i.e., first optical surface). The pressure change deforms the center portion of the membrane (i.e., first optical surface). The actuation force applied by the electromagnetic actuator also changes the contact between the lens shaper (i.e., rim) and the membrane (i.e., first optical surface). More specifically, the lens shaper is fixed to the membrane to define the clear aperture and pressing the outer portion of the membrane changes the contact force between the lens shaper and the membrane. Such change of contact force also leads to the deformation of the center portion of the membrane (i.e., the portion of the membrane within the lens shaper).

	Working principle The EL-10-30 is a shape-changing lens, as illustrated in Figure 5. It consists of a container, which is filled with an optical fluid and sealed off with an elastic polymer membrane. The deflection of the lens is proportional to the pressure in the fluid. The EL-10-30 has an electromagnetic actuator that is used to exert pressure on the container. Hence, the focal distance of the lens is controlled by the current flowing through the coil of the actuator.  *Figure 5: Working principle of the EL-10-30 series.* Optotune EL-10-30-Series Spec Sheet at 6. **Resolution and reproducibility** The step size of the focal power is limited by the resolution of the DAC of the current driver. For high precision applications a driver with 12 bits is recommended. As the relation between current and focal power is linear, the smallest step of e.g. the EL-10-30-C-VIS-LD about 0.0018 Dpt. Unlike piezo systems, the EL-10-30 exhibits no hysteresis. The current through the coil induces a force, which is directly transferred onto the elastic membrane. There is no friction in the system. This means that at a constant temperature jumping between alternate current levels will always yield the same focal length. The effect of changes in temperature are described above. Optotune's Lens Driver 4 offers a focal power mode, which makes use of calibration data stored in the lens (EEPROM of the STTS2004). The absolute reproducibility achieved over an operating temperature range of 10 to 50°C amounts to typically 0.1 diopters. More details on the focal power mode are provided in the Lens Driver manual. Optotune EL-10-30-Series Spec Sheet at 10.

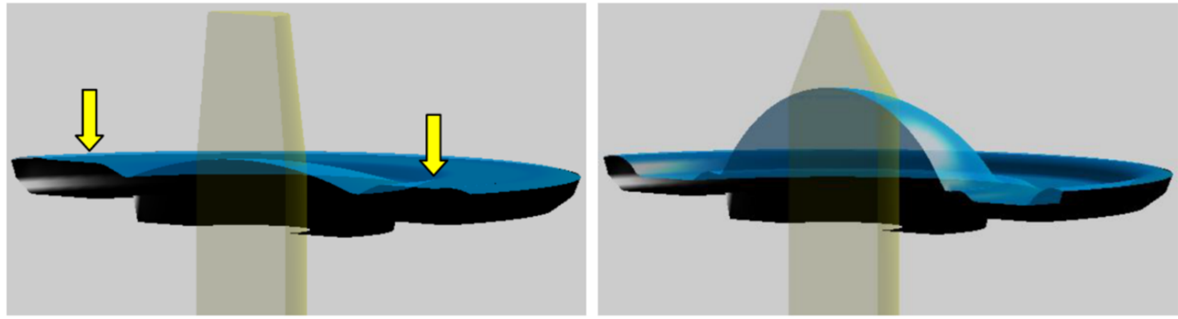


Figure 3: Working principle of the Optotune's EL-10-30. In this case, the lens-shaper ring remains in place relative to the container. The only movement is a ring that pushes down on the membrane with increasing current in the outer part of the lens, thus pumping the liquid into the lens that forms in the center.

Optotune Focus Tunable Lenses and Laser Speckle Reduction at 3.

In addition, the membrane in Optotune EL-10-30-C is configured to deform as a result of a change in a pressure applied to the fluid (e.g., pressure applied by the actuation ring). Alternatively, the membrane is also configured to deform as a result of a change in contact between the actuation ring and the membrane, i.e., the actuation pushes down on the membrane and therefore changes the pressure between them. The change in pressure, in turn, causes the center portion of the membrane to deform.

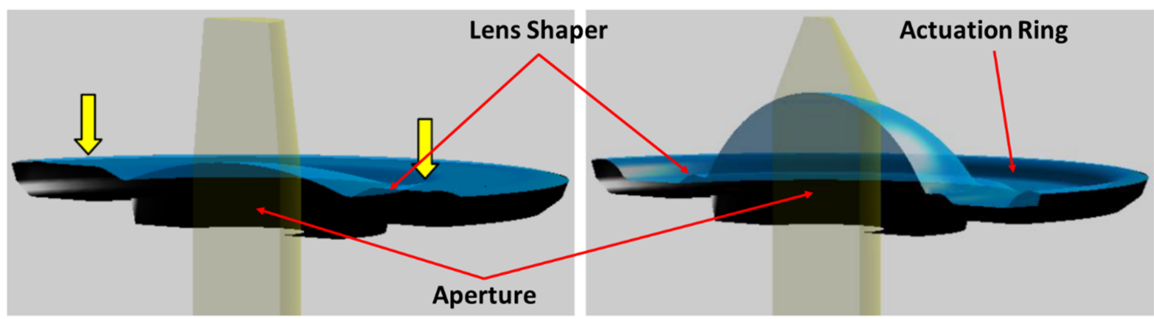
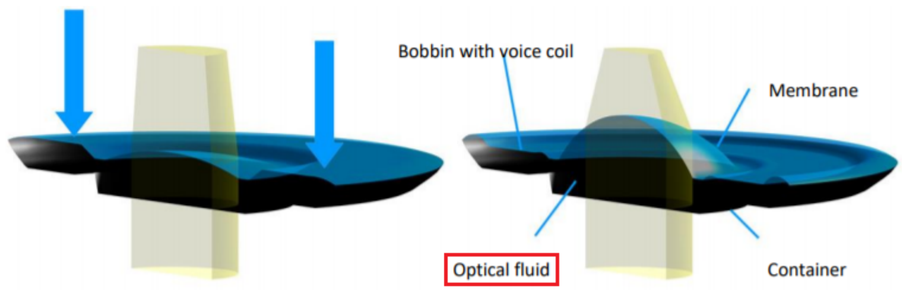
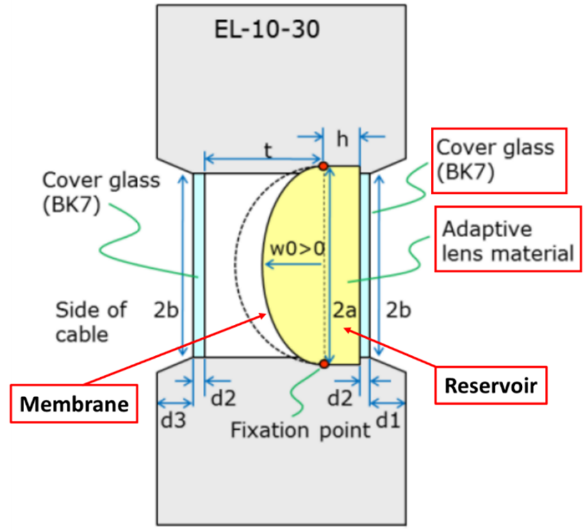
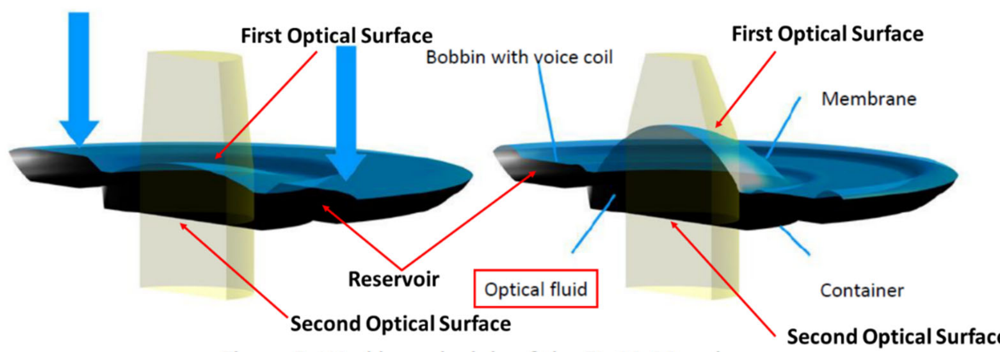
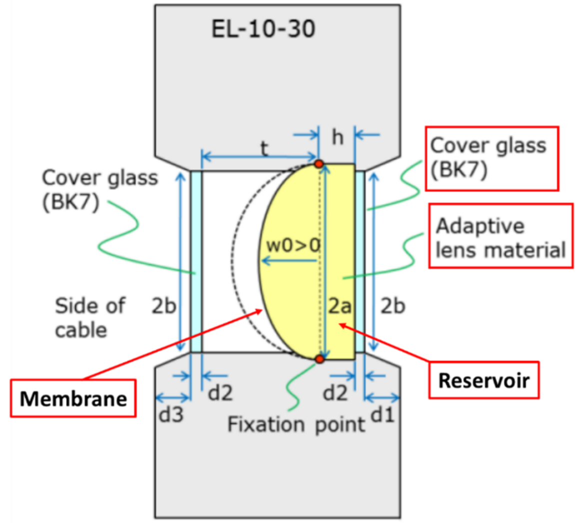
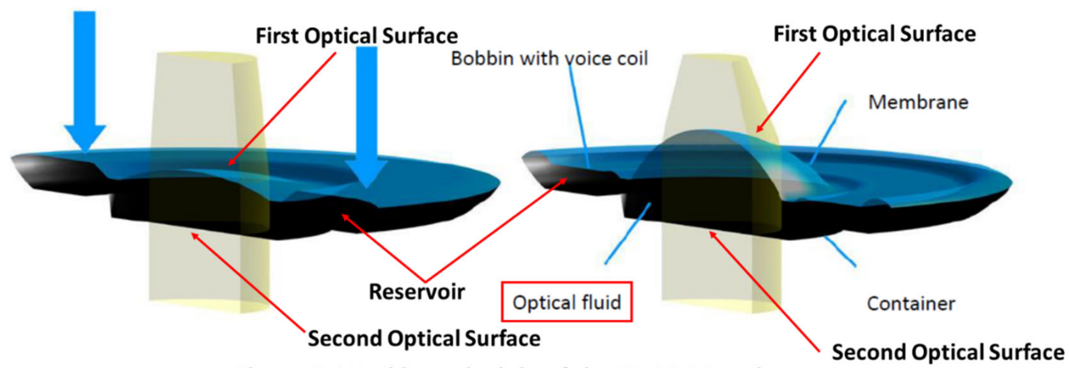


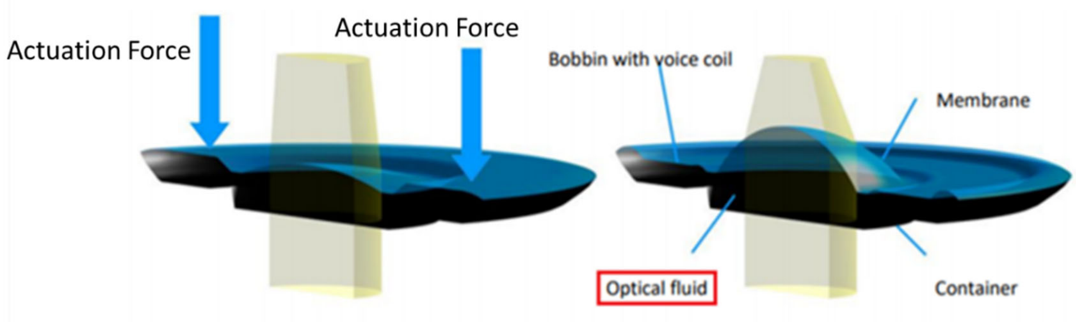
Figure 3: Working principle of the Optotune's EL-10-30. In this case, the lens-shaper ring remains in place relative to the container. The only movement is a ring that pushes down on the membrane with increasing current in the outer part of the lens, thus pumping the liquid into the lens that forms in the center.

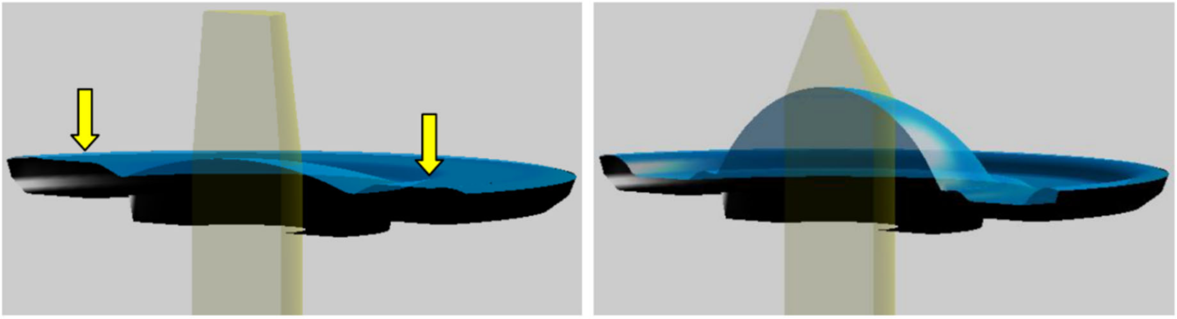
Optotune Focus Tunable Lenses and Laser Speckle Reduction at 3.

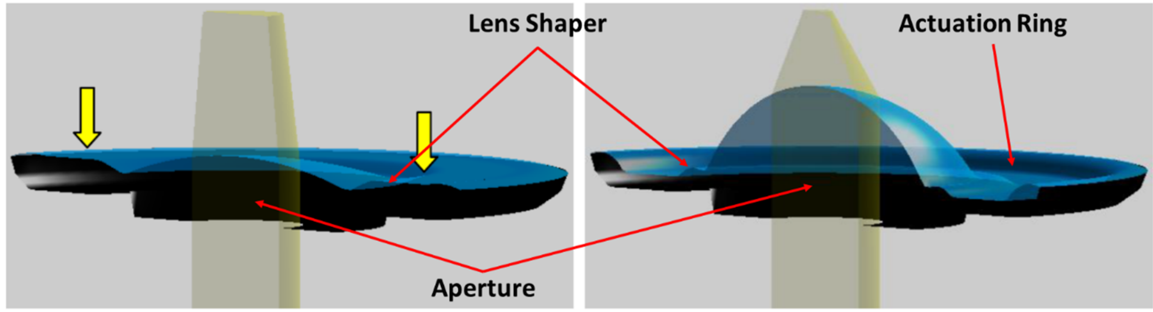
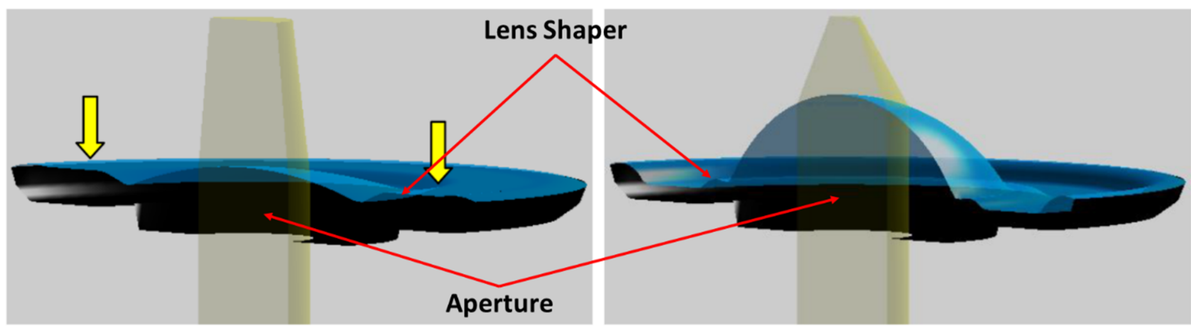
[13Pre] A fluidic lens, comprising:	The Accused Products meet this limitation. The Optotune EL-10-30-C includes a fluidic lens (i.e. electrically tunable lens EL-10-30-C with optical fluid). More specifically, the Optotune EL-10-30-C lens is a shape-changing lens based on a combination of optical fluids and a polymer membrane. **Working principle** The EL-10-30 is a shape-changing lens, as illustrated in Figure 5. It consists of a container, which is filled with an optical fluid and sealed off with an elastic polymer membrane. The deflection of the lens is proportional to the pressure in the fluid. The EL-10-30 has an electromagnetic actuator that is used to exert pressure on the container. Hence, the focal distance of the lens is controlled by the current flowing through the coil of the actuator.  *Figure 5: Working principle of the EL-10-30 series.* Optotune EL-10-30-Series Spec Sheet at 6.
[13A] a reservoir at least partially bounded by a first optical surface and a second optical surface;	The Accused Products meet this limitation. The Optotune EL-10-30-C includes a reservoir at least partially bounded by a first optical surface (i.e., membrane) and a second optical surface (i.e., cover glass).

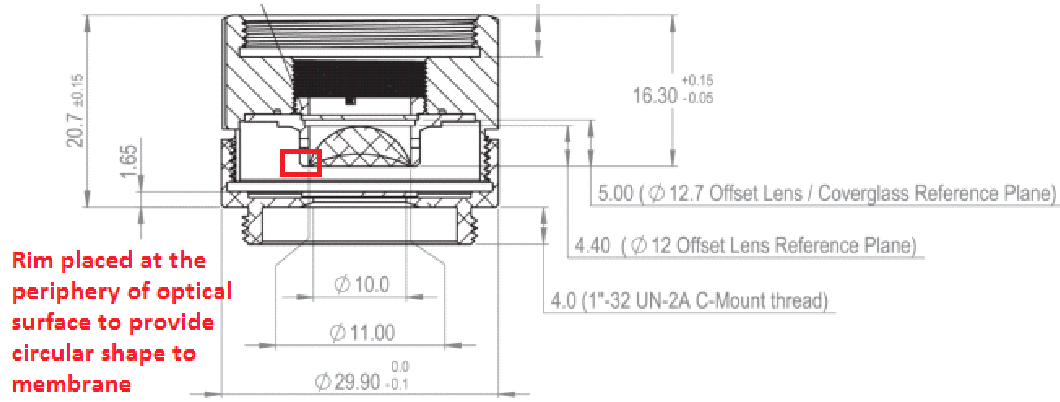
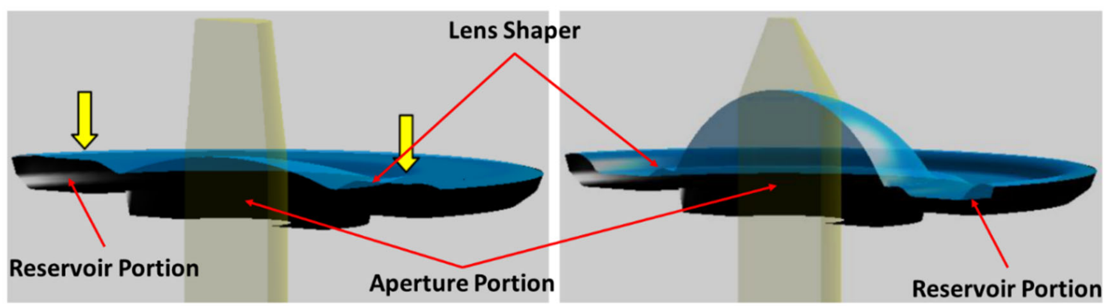
	 Optotune EL-10-30-Series Spec Sheet at 5.  *Figure 5: Working principle of the EL-10-30 series.* Optotune EL-10-30-Series Spec Sheet at 6.
[13B] a fluid; wherein the fluid fills a volume of the reservoir;	The Accused Products meet this limitation. The Optotune EL-10-30-C includes a fluid (also referred to as adaptive lens material) that fills a volume of the reservoir.

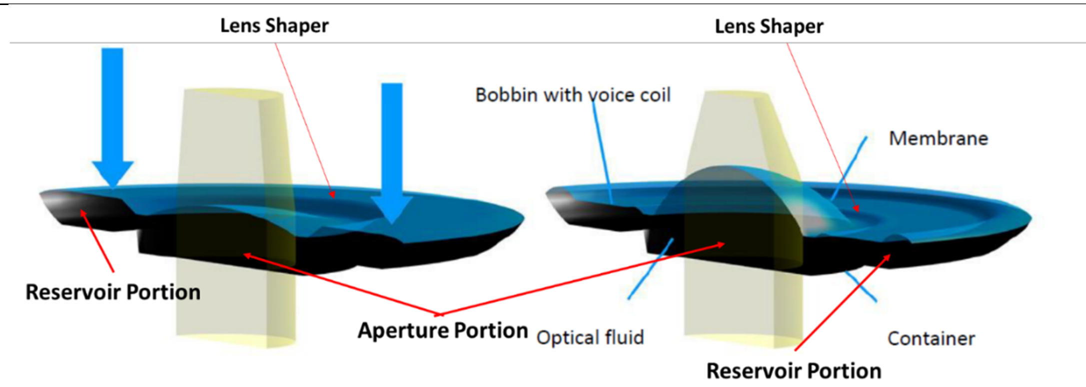
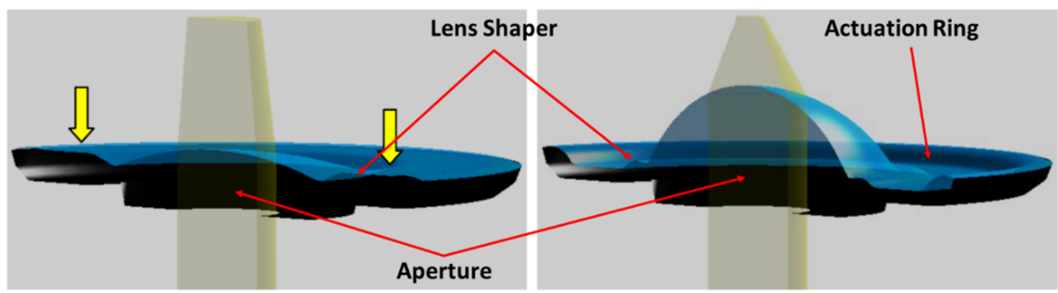
	 Optotune EL-10-30-Series Spec Sheet at 5.  *Figure 5: Working principle of the EL-10-30 series.* Optotune EL-10-30-Series Spec Sheet at 6.

	Working principle The EL-10-30 is a shape-changing lens, as illustrated in Figure 5. It consists of a container, which is filled with an optical fluid and sealed off with an elastic polymer membrane. The deflection of the lens is proportional to the pressure in the fluid. The EL-10-30 has an electromagnetic actuator that is used to exert pressure on the container. Hence, the focal distance of the lens is controlled by the current flowing through the coil of the actuator. Optotune EL-10-30-Series Spec Sheet at 6.
[13C] wherein one or more of the first or second optical surface is configured to deform as a result of a change in a pressure applied to the fluid;	The Accused Products meet this limitation. The Optotune EL-10-30-C includes an electromagnetic actuator to apply a pressure to the fluid by pressing the outer portion of the membrane (i.e., first optical surface). The pressure change deforms the center portion of the membrane (i.e., first optical surface). **Working principle** The EL-10-30 is a shape-changing lens, as illustrated in Figure 5. It consists of a container, which is filled with an optical fluid and sealed off with an elastic polymer membrane. The deflection of the lens is proportional to the pressure in the fluid. The EL-10-30 has an electromagnetic actuator that is used to exert pressure on the container. Hence, the focal distance of the lens is controlled by the current flowing through the coil of the actuator.  *Figure 5: Working principle of the EL-10-30 series.* Optotune EL-10-30-Series Spec Sheet at 6.

	Resolution and reproducibility The step size of the focal power is limited by the resolution of the DAC of the current driver. For high precision applications a driver with 12 bits is recommended. As the relation between current and focal power is linear, the smallest step of e.g. the EL-10-30-C-VIS-LD about 0.0018 Dpt. Unlike piezo systems, the EL-10-30 exhibits no hysteresis. The current through the coil induces a force, which is directly transferred onto the elastic membrane. There is no friction in the system. This means that at a constant temperature jumping between alternate current levels will always yield the same focal length. The effect of changes in temperature are described above. Optotune's Lens Driver 4 offers a focal power mode, which makes use of calibration data stored in the lens (EEPROM of the STTS2004). The absolute reproducibility achieved over an operating temperature range of 10 to 50°C amounts to typically 0.1 diopters. More details on the focal power mode are provided in the Lens Driver manual. Optotune EL-10-30-Series Spec Sheet at 10.  Figure 3: Working principle of the Optotune's EL-10-30. In this case, the lens-shaper ring remains in place relative to the container. The only movement is a ring that pushes down on the membrane with increasing current in the outer part of the lens, thus pumping the liquid into the lens that forms in the center. Optotune Focus Tunable Lenses and Laser Speckle Reduction at 3.
[13D] a piston member disposed for contacting the first or second optical surface; and	The Accused Product meet this limitation. The Optotune EL-10-30-C includes an actuation ring disposed for contacting the membrane (i.e., first optical surface) and pressing the membrane.

	 Figure 3: Working principle of the Optotune's EL-10-30. In this case, the lens-shaper ring remains in place relative to the container. The only movement is a ring that pushes down on the membrane with increasing current in the outer part of the lens, thus pumping the liquid into the lens that forms in the center. Optotune Focus Tunable Lenses and Laser Speckle Reduction at 3.
[13E] a rim member disposed for contacting the first or second optical surface;	The Accused Products meet this limitation. The Optotune EL-10-30-C includes a lens shaper (i.e., rim) configured to contact the membrane (i.e., first optical surface).  Figure 3: Working principle of the Optotune's EL-10-30. In this case, the lens-shaper ring remains in place relative to the container. The only movement is a ring that pushes down on the membrane with increasing current in the outer part of the lens, thus pumping the liquid into the lens that forms in the center. Optotune Focus Tunable Lenses and Laser Speckle Reduction at 3.

	 Optotune EL-10-30-Series Spec Sheet at 3.
[13F] wherein the rim is configured to divide a fluid-filled volume of the reservoir into an aperture portion and a reservoir portion,	The Accused Products meet this limitation. The lens shaper (i.e., rim) in the Optotune EL-10-30-C divides the fluid filled volume of the reservoir into an aperture portion (i.e., the portion within the lens shaper that can pass light through) and a reservoir portion (i.e., the portion outside the lens shaper).  Figure 3: Working principle of the Optotune's EL-10-30. In this case, the lens-shaper ring remains in place relative to the container. The only movement is a ring that pushes down on the membrane with increasing current in the outer part of the lens, thus pumping the liquid into the lens that forms in the center. Optotune Focus Tunable Lenses and Laser Speckle Reduction at 3.

	 *Figure 5: Working principle of the EL-10-30 series.* Optotune EL-10-30-Series Spec Sheet at 6.
[13G] wherein the reservoir and piston are configured for translational motion relative to each other;	The Accused Product meet this limitation. The actuation ring (i.e., piston) in the Optotune EL-10-30-C is configured to be translated with respect to the reservoir. The actuation ring is driven by a voice coil to press against the membrane and the pressing force is substantially perpendicular to the horizontal plane (as indicated by the yellow arrows below), i.e., the relative motion between the actuation ring and the reservoir is translational.  Figure 3: Working principle of the Optotune's EL-10-30. In this case, the lens-shaper ring remains in place relative to the container. The only movement is a ring that pushes down on the membrane with increasing current in the outer part of the lens, thus pumping the liquid into the lens that forms in the center. Optotune Focus Tunable Lenses and Laser Speckle Reduction at 3.

<table>
<tr><td>[13H] wherein one or more of said translational motion, said contact between piston and first or second optical surface or said contact between rim and first or second optical surface result in said change in pressure and deformation of the first or second optical surface.</td><td>The Accused Products meet this limitation.

The translational motion between the actuation ring (i.e., piston) and the outer portion of the membrane (i.e., first optical surface) results in the change in pressure and deformation of the central portion of the membrane (i.e., first optical surface).

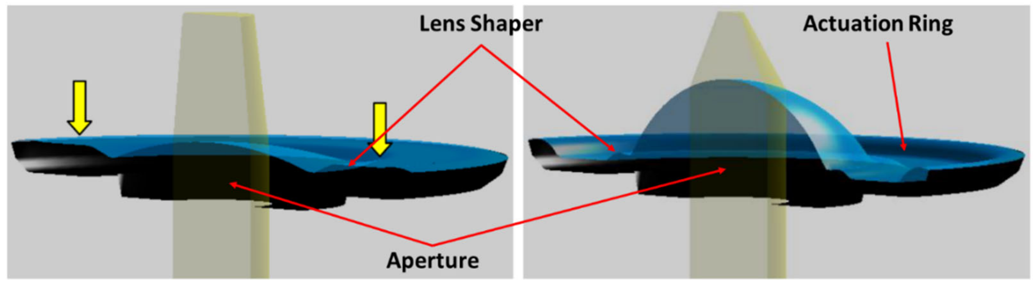


Figure 3: Working principle of the Optotune's EL-10-30. In this case, the lens-shaper ring remains in place relative to the container. The only movement is a ring that pushes down on the membrane with increasing current in the outer part of the lens, thus pumping the liquid into the lens that forms in the center.

Optotune Focus Tunable Lenses and Laser Speckle Reduction at 3.</td></tr>
<tr><td>[25Pre] A fluidic lens, comprising:</td><td>The Accused Products meet this limitation. See Claim 13Pre supra.</td></tr>
<tr><td>[25A] a reservoir at least partially bounded by a first optical surface and a second optical surface;</td><td>The Accused Products meet this limitation. See Claim 13A supra.</td></tr>
<tr><td>[25B] a fluid; wherein the fluid fills a volume of the reservoir;</td><td>The Accused Products meet this limitation. See Claim 13B supra.</td></tr>
<tr><td>[25C] wherein one or more of the first optical surface or second optical surface is configured to deform as a</td><td>The Accused Products meet this limitation. See Claim 13C supra.</td></tr>
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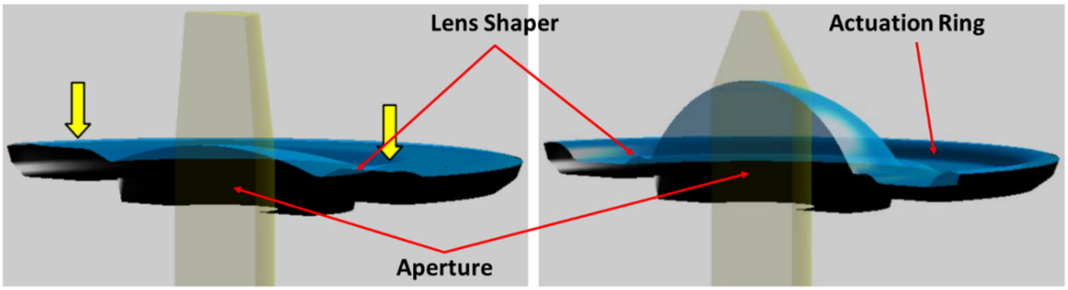
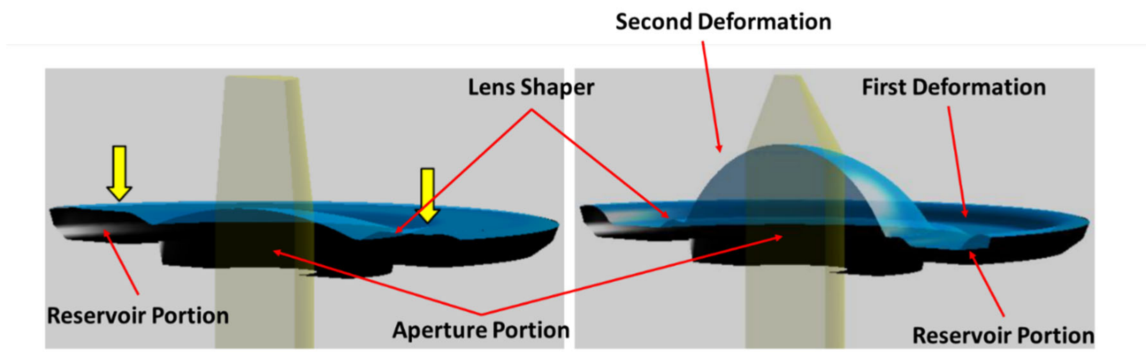
result of a change in a pressure of the fluid;	
[25D] a piston member disposed for contacting an optical surface,	The Accused Products meet this limitation. *See* Claim 13D *supra*.
[25E] wherein the reservoir is configured for translational motion relative to the piston, or the piston is configured for translational motion relative to the reservoir;	The Accused Products meet this limitation. *See* Claim 13G *supra*.
[25F] wherein said translational motion and said contact between the piston and an optical surface results in said change in pressure and said deformation of the first or second optical surface;	The Accused Products meet this limitation. The translational motion and the contact between the actuation ring (i.e., piston) and the outer portion of the membrane (i.e., first optical surface) results in the change in pressure and deformation of the central portion of the membrane (i.e., first optical surface).  Figure 3: Working principle of the Optotune's EL-10-30. In this case, the lens-shaper ring remains in place relative to the container. The only movement is a ring that pushes down on the membrane with increasing current in the outer part of the lens, thus pumping the liquid into the lens that forms in the center. Optotune Focus Tunable Lenses and Laser Speckle Reduction at 3.

[25G] further including a rim disposed for contacting an optical surface;	The Accused Products meet this limitation. *See* Claim 13E *supra*.
[25H] wherein one or more of said translational motion or deformation of the first or second optical surface results in a second deformation of an optical surface disposed proximal to the rim.	The Accused Products meet this limitation. The translational motion between the piston (i.e., actuation ring) and the membrane (i.e., first optical surface) changes the pressure in the reservoir and results in a second deformation of the membrane disposed proximal to the rim (i.e., second deformation within the lens shaper).  Figure 3: Working principle of the Optotune's EL-10-30. In this case, the lens-shaper ring remains in place relative to the container. The only movement is a ring that pushes down on the membrane with increasing current in the outer part of the lens, thus pumping the liquid into the lens that forms in the center. Optotune Focus Tunable Lenses and Laser Speckle Reduction at 3.
[34Pre] A fluidic lens, comprising:	The Accused Products meet this limitation. *See* Claim 13Pre *supra*.
[34A] a reservoir at least partially bounded by a first optical surface and a second optical surface;	The Accused Products meet this limitation. *See* Claim 13A *supra*.
[34B] a fluid, wherein the fluid fills a volume of the reservoir,	The Accused Products meet this limitation. *See* Claim 13B *supra*.

<table>
<tr>
<td>[34C] wherein one or more of the first or second optical surface is made of glass between about 0.7 mm and about 0.2 mm in thickness; and</td>
<td>The Accused Products meet this limitation.

The second optical surface (i.e., cover glass) in Optotune EL-10-30-C has a thickness of about 0.5 mm.

<table>
<tr><th></th><th></th><th>EL-10-30-TC [mm]</th><th>EL-10-30-C [mm]</th></tr>
<tr><td>a:</td><td>Semi-diameter of lens</td><td>5.5</td><td>5.5</td></tr>
<tr><td>b:</td><td>Outer semi-diameter 1 (clear aperture)</td><td>5.0</td><td>5.0</td></tr>
<tr><td>c:</td><td>Inner semi-diameter</td><td>-</td><td>7.0</td></tr>
<tr><td>d:</td><td>Outer semi-diameter 2</td><td>-</td><td>11.9</td></tr>
<tr><td>w0:</td><td>Central deflection of lens</td><td>In function of applied current</td><td></td></tr>
<tr><td>d0:</td><td>Thickness outer thread</td><td>-</td><td>4</td></tr>
<tr><td>d1:</td><td>Distance from bottom cover glass to housing</td><td>1.35 ± 0.2</td><td>1.15</td></tr>
<tr><td>d2:</td><td>Thickness of cover glasses</td><td>0.5</td><td>0.5</td></tr>
<tr><td>h:</td><td>Constant zone of lens material</td><td>2.35 ± 0.2</td><td>2.65 ± 0.3</td></tr>
<tr><td>t:</td><td>Cover glass distance</td><td>5</td><td>5</td></tr>
<tr><td>d3:</td><td>Distance from top cover glass to housing</td><td>1.0</td><td>-</td></tr>
<tr><td>d4:</td><td>Thickness holder ring</td><td>-</td><td>2</td></tr>
<tr><td>d5:</td><td>Distance from holder ring to housing</td><td>-</td><td>4.3</td></tr>
<tr><td>d6:</td><td>Thickness inner tread</td><td>-</td><td>4.5</td></tr>
<tr><td>Fixation point:</td><td>Lens edges always stay in the same axial position</td><td></td><td></td></tr>
</table>

Optotune EL-10-30-Series Spec Sheet at 5.</td>
</tr>
<tr>
<td>[34D] a rim configured to contact a portion of the first or second optical surface from outside the reservoir,</td>
<td>The Accused Products meet this limitation. See Claim 1C supra.</td>
</tr>
<tr>
<td>[34E] wherein one or more of the first optical surface or second optical surface is configured to deform as a result of a change in a pressure applied to the fluid or a change in contact</td>
<td>The Accused Products meet this limitation. See Claim 13C supra.</td>
</tr>
</table>

<table>
<tr><td>between the rim and the first or second optical surface.</td><td></td></tr>
<tr><td>[36Pre] A fluidic lens, comprising:</td><td>The Accused Products meet this limitation. See Claim 13Pre supra.</td></tr>
<tr><td>[36A] a reservoir at least partially bounded by a first optical surface and a second optical surface;</td><td>The Accused Products meet this limitation. See Claim 13A supra.</td></tr>
<tr><td>[36B] a fluid, wherein one or more of the first or second optical surface is made of glass between about 0.7 mm and about 0.2 mm in thickness; wherein the fluid fills a volume of the reservoir;</td><td>The Accused Products meet this limitation.

The second optical surface (i.e., cover glass) in Optotune EL-10-30-C has a thickness of about 0.5 mm.

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</table>

Optotune EL-10-30-Series Spec Sheet at 5.</td></tr>
</table>

[36C] wherein one or more of the first optical surface or second optical surface is configured to deform as a result of a change in a pressure of the fluid;	The Accused Products meet this limitation. *See* Claim 13C *supra*.
[36D] a piston member disposed for contacting an optical surface,	The Accused Products meet this limitation. *See* Claim 13D *supra*.
[36E] wherein the reservoir is configured for translational motion relative to the piston, or the piston is configured for translational motion relative to the reservoir;	The Accused Products meet this limitation. *See* Claim 13G *supra*.
[36F] wherein said translational motion and said contact between the piston and an optical surface results in said change in pressure and said deformation of the first or second optical surface.	The Accused Products meet this limitation. *See* Claim 25F *supra*.